

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Recommendation To Delay Filing Of)	DA 98-109
47 CFR Sec 52.3(e) Waiver Requests by)	
Individual Carriers For Local Number)	
Portability Phase I Implementation)	

GTE's COMMENTS IN SUPPORT OF NANC

GTE Service Corporation and its telephone and wireless companies ("GTE")¹ hereby submit comments in support of the recommendation of the North American Numbering Council ("NANC") referred to in the above-referenced Public Notice ("Notice")². Because of the failure of the Number Portability Administration Center ("NPAC") vendor for the Southeast, Western and West Coast regions, NANC recommends that the Commission grant a 30 day delay of the deadline for filing Local Number Portability ("LNP") waivers for Phase I implementation with respect to those

¹ GTE Alaska, Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., Contel of the South, Inc., GTE Communications Corporation, and GTE Hawaiian Tel International Incorporated.

² Public Notice DA 98-109 released January 21, 1998, CC Docket No. 95-116.

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regions. Acceptance of this recommendation would have the effect of moving the deadline for requesting a waiver from January 29, 1998 to March 1, 1998.

GTE is directly affected by the instant proceeding, because it must implement LNP in two MSAs during Phase I³ where the current NPAC vendor⁴ was unable to provide a stable platform for the NPAC database in a timely manner. As the letter from the NANC Chairman⁵ states, the limited liability corporations ("LLCs") in the affected regions are currently evaluating the impact of this failure and are identifying possible solutions to facilitate LNP implementation; and the affected LLCs expect to provide the Commission with pertinent information regarding this issue at the end of January.

GTE agrees with NANC that the grant of the NANC request will result in a more complete record in this matter upon which the FCC will be able to place greater reliance. Denial of the NANC request will provide no benefit in that a number of virtually identical waiver requests will have to be filed on behalf of the affected carriers not later than the original deadline of January 29, 1998 -- all concerned with the same NPAC vendor failure. This would be unnecessarily complicated and an unnecessary drain on the resources of the affected carriers and the Commission as well⁶.

³ The Los Angeles MSA in the West Coast region and the Minneapolis MSA in the Western region.

⁴ Perot Systems, Inc.

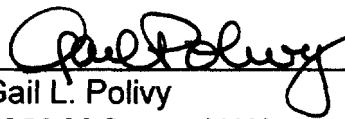
⁵ Letter from Alan Hasselwander, Chairman, North American Numbering Council, to A. Richard Metzger, Jr. Chief, Common Carrier Bureau, Federal Communication Commission, dated January 21, 1998.

⁶ As the NANC letter states, the requested filing delays should not be construed to imply a delay in the implementation schedule for LNP.

GTE will continue working with the LLCs and NPAC vendors to resolve this problem in a manner that will lead to the prompt and successful implementation of LNP in the affected regions. The NANC recommendation to grant a delay of 30 days in the deadline to file LNP Phase I implementation is in the public interest, and GTE urges the Commission to take prompt and favorable action granting the requested delay.

Respectfully submitted,

GTE Service Corporation and its telephone
and wireless companies

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January 26, 1998

Its Attorneys

Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "GTE's Comments in Support of NANC" have been mailed by first class United States mail, postage prepaid, on January 26, 1998 to all parties of record.



Ann D. Berkowitz